

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

2022 MAR 10 PM 1:25

CLERK

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UNITED STATES OF AMERICA )

v. )

JOHN GENTILE )

Defendant. )

Criminal No. 22-cr-27-1

INDICTMENT

The Grand Jury charges:

COUNT ONE

Between in or about January 2020 and in or about January 2022, in the District of Vermont and elsewhere, the defendant, JOHN GENTILE, and others, known and unknown to the Grand Jury, knowingly and willfully conspired to distribute and possess with the intent to distribute Tramadol, a Schedule IV controlled substance.

(21 U.S.C. §§ 841(a), 841(b)(2), 846)

FORFEITURE NOTICE ONE

1. The allegations contained in Count One of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 21 U.S.C. § 853.

2. Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21 U.S.C. §§ 841 & 846, the defendant, JOHN GENTILE, shall forfeit to the United States any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense. The property to be forfeited includes, but is not limited to, United States funds in the amount of gross proceeds obtained as a result of the violation.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of this court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(21 U.S.C. § 853)

A TRUE BILL

**REDACTED**

FOREPERSON

*Nikolas P. Kerest*

(JJB)

NIKOLAS P. KEREST

United States Attorney

Burlington, Vermont

March 10, 2022